

Response and Remarks

Prior to this amendment, Claims 1-73 were pending in this case, with claims 5, 25, 31-33, 68-70, and 72-73 temporarily withdrawn pursuant to a restriction requirement.

In accordance with the steps agreed by the Examiner and Applicant after an in-person interview of January 14, 2004 (the "Interview"), the Applicant submits this paper to do the following:

1. Continue prosecution after final rejection.
2. Amend claims 1, 2, 4, 21, 22, 24, 60, and 61 in the manner agreed by the Examiner in the Interview of January 14, 2004 (the "Interview") in order to overcome the Section 112 rejections. Claims 16, 40, and 45 also are similarly amended. Claim 12 is amended to provide antecedent basis and, as discussed in the Interview, claims 56 and 57 are amended to clarify that the identifiers of at least two records must be displayed.
3. Add claims 74 and 75, which are variations of claims 4 and 24.
4. Cancel the non-elected claims, namely claims 5, 25, 31-33, 68-70, 72, and 73. The Applicant plans to file a divisional application, continuation application, or Request for Continued Examination to allow the examination of these claims in the future. The Applicant also notes that there is no fee for adding dependent claims 74 and 75, since dependent claims 31 and 32 are herein canceled so that the number of claims pending in the application has not increased.
5. Explain, as done in the Interview, that Miike teaches away from the present invention and request that this reference be withdrawn.
6. Respond in detail to the Examiner's Office Action of November 26, 2003.

The Applicant requests that the Examiner enter all amendments and find that all claims are now allowable as written.

Summary of Interview with Examiner

On January 14, 2004, an in-person interview (the "Interview") was conducted between the Examiner and the Applicant. The Applicant accepts the Examiner's summary of the Interview, adding the following comments with additional detail:

The Applicant showed the Examiner the precise form of each amendment to claims 1, 2, 4, 21, 22, 24, 56, 57, 60 and 61, except for the following minor changes: (i) claim 24 has "and marking" added to conform it to the language of claim 4, since it is merely the apparatus analogous to the invention disclosed in claim 4; (ii) no amendments are made to limit the scope of any claim to dealing with legal materials; and (iii) in the copy shown to the Examiner, claims 56 and 57 included "displaying in a second panel the identifier of at least two different records." For clarity, this has been changed to "displaying in a second panel the identifier of each record of at least two different records." This clarifies that two identifiers are displayed -- one for each record -- and avoids the misinterpretation that there would generally be one identifier for both of the records. The Examiner approved the presented amendments and said they would overcome the Section 112 rejections. In addition, the Examiner suggested writing claim 4 in independent form to be in condition for allowance, if we wanted that claim allowed before filing a Request for Continued Examination. We also noted how claim 24 is the apparatus analog for the method claimed in claim 4.

During the Interview, we discussed the Section 112 rejections in detail. It was discovered that the rejections resulted from a misunderstanding regarding how to read claims 1 and 21. The Examiner had thought there was an element "the identifiers content elements" which had no

antecedent basis. The Applicant explained that no such element was intended – that the claims were intended to be read to claim the simultaneous display of identifiers and content elements. It was agreed that deleting the phrase “with the identifiers” would resolve the ambiguity and overcome the rejection. We also agreed that the proposed amendments to claims 2 and 22 to replace “selected” with “displayed content” would provide the proper antecedent basis and overcome those rejections. Similarly, we agreed that amending claims 4 and 24 to replace “search request” and “search,” respectively, with “database query” would better conform the language to claims 1 and 21 respectively and resolve any possible vagueness. Finally, we agreed that adding “responsive to a database query” to claims 60 and 61 would provide proper antecedent basis. As noted in the Examiner’s summary, these amendments overcome all Section 112 rejections.

As part of the discussion of the Section 112 rejections, the Applicant explained the invention, using the figures in the original application. In addition, the Applicant explained how the invention is used commercially, implementing some of the embodiments described in the application.

The Examiner and Applicant discussed the amendments made to claims 1, 21, 56 and 57 to emphasize that at least two identifiers must be displayed for these claims. (It is the applicant’s understanding that “a plurality” requires at least two, but the amendment is made for further clarity.) The Examiner accepted these amendments. In addition, we discussed examples of embodiments of claims 56 and 57, using the figures in the application.

The Examiner and Applicant also discussed the Section 103 rejections and the Miike reference in detail. The Section 103 rejection was based on Barr in view of Miike, and Miike was cited to teach retrieving “a document name and the content of the document” (Office Action,

page 4). During the Interview, we discussed how the portion of Miike cited by the Examiner, namely col. 24, lines 15-32, taught away from the present invention, so that it would not be properly combined with Barr. We noted how Miike says that “when there are more than one documents in a retrieval result, a list of the document names is displayed.” Miike expressly limits showing content of the document to the special case in which “there is only one document in the retrieval result.” Col. 24, lines 18-23. We examined figures 21 and 24 that were mentioned in the cited discussion of Miike, and agreed that neither taught the display of document content. We discussed how Miike simply reinforces the prior art notion that when there are at least two results in a search result, one should merely display document names. The user must select one of the documents in order to see its content. See col. 24, lines 23-39. Only in the special case in which there is only one result, so that there is no choice as to which result to select, does Miike teach the showing of content. The Examiner agreed that this taught away from the present invention and said she expected she would remove Miike as a reference.

There also was a discussion of the possibility of limiting certain claims to records that are legal materials, and the Applicant showed a possible amendment to claims 1 and 21 that would make this restriction. The Examiner said this could indeed be sufficient to make claims 1 and 21 allowable, although it was not said to be necessary; either way further examination likely would be required. Later in the Interview, it was recognized that it would not be necessary to amend the claims generally to restrict their scope to legal materials, since at the very least a number of claims, such as claims 4 and 24, appear to be novel without making any further limitations. Claim 50, which teaches replacing a displayed content element with other content elements, was noted as another possible example of such a claim. We also noted that claims such as claim 15 that deals with multiple levels of sorting and claims 60 and 61 which deal with resorting results

are other possible examples of such claims. (The Applicant explained these claims using the figures in the Application). In fact, no claims were determined to require a limitation to legal materials. Indeed, the Applicant did not and does not herein represent that any claims must be limited to legal materials to be patentable and no amendments are made to limit the scope of any claim to legal materials.

The Applicant said he would file amendments consistent with this Interview by the two-month deadline. The Examiner said she hoped to be able to issue an advisory opinion in approximately two weeks, indicating which claims are allowable, removing the Section 112 rejection, and removing Miike. After receiving the advisory action, the Applicant said he would delete all non-allowed claims to permit a patent to issue with any allowed claims. Then, the Applicant said he would file a Request for Continued Examination to allow examination of all remaining unallowed claims.

On January 23, 2004, the Applicant had a brief phone conversation with the Examiner, in which he reviewed the procedure he planned to follow in the prior paragraph.

At the conclusion of the Interview, the Applicant thanked the Examiner for her time and detailed guidance. The Applicant would like to express his appreciation again here.

Summary of amendments

Applicant has amended claims 1, 2, 4, 21, 22, 24, 60, and 61 to clarify the language of those claims and overcome the Examiner's Section 112 rejections for vagueness and lack of antecedent basis. These amendments were agreed upon by the Examiner in the Interview. Claims 16, 40, and 45 are similarly amended. Claim 12 is amended to provide proper antecedent basis.

The Applicant further amends claims 1 and 21 to further enhance the non—obviousness of the claims, in light of the Examiner’s rejections, by clarifying that the identifiers of at least two of the records must be displayed. This amendment was discussed during the Interview in which the Examiner agreed that Miike teaches away from displaying content elements simultaneously with identifiers when there are at least two search results. These amendments are directed to the subject matter in the original specification, p. 6, lines 8-16, and figs. 2 and 3.

Applicant replaces “a” with “said” in claim 12, since claim 12 depends from claim 7 and refers to the record date in claim 7. This also gives claim 12 a form analogous to claims 10 and 11.

Applicant also adds “and marking” to claim 24 to conform it to the language of claim 4, since it is merely the apparatus analogous to the invention disclosed in claim 4.

Applicant amends claims 56 and 57 to overcome the Examiner’s Section 103 rejection. These amendments were discussed in the Interview.

Applicant adds claims 74 and 75 as minor variations of claims 4 and 24. Claims 74 and 75 remove the requirement in claims 4 and 24, respectively, that the identified records have been *displayed in their entirety* in a prior search. For the new claims, it is enough that the records were part of the results set of a prior search or database query – they need not have been displayed in their entirety. These claims have no new matter, and are directed to p. 5, lines 9-11; p. 11, lines 8-10 (record was returned by a prior search); p. 15, lines 14-24 (records not selected for a full-text view); and p.18, lines 7-13 (records responsive in a previous results list).

Discussion of Amendments and Response to Rejections

The Examiner rejects claims 1 and 21 stating that there is no antecedent basis for the element “the identifiers content element.” The Applicant never intended such an element and

respectfully asserts that the claim is intended to be read differently. Claims 1 and 21 involve the simultaneous display of two things: (i) identifiers and (ii) content elements. Adding additional punctuation, claim 1, for example, was intended to be read to comprise the steps of: displaying a list of identifiers for a plurality of said responsive records; and displaying simultaneously – with the identifiers – content elements of at least one of the records. What is displayed simultaneously are the identifiers and the content elements. “With the identifiers” had been added for additional clarity to emphasize that the content elements are displayed simultaneously with the identifiers. However, the addition of “with the identifiers” appears to have caused confusion, so claims 1 and 21 are amended to delete that phrase. It can be seen that “the identifiers content elements” is not intended as an element, so no antecedent basis is required. The claim as amended no longer can be claimed to contain this element, so the Examiner’s rejection is overcome.

The amendments to claims 1 and 21 clarify that claims 2 and 22 have proper antecedent basis, with “selected elements” referring to the content elements that have been selected for simultaneous display. A minor amendment to claims 2 and 22 is made to provide additional clarity, replacing the word “selected” with “displayed” and adding the word “content” to better track the language of claims 1 and 21. Thus, the Examiner’s rejection is overcome. These amendments are technical and do not change the meaning of claims 2 and 22, so they will only require a cursory review by the Examiner.

Claims 4 and 24 have been amended as suggested by the Examiner to use the words “database query” that are used in claims 1 and 21, rather than the synonymous “search request” language. Since this is a technical change in language agreed to by the Examiner, the amendments should only require a cursory review. Similarly, claims 16, 40, and 45 are amended

to replace “search” with “database query” to better conform the language to the claims to the claims from which they depend.

Applicant has amended claims 60 and 61 to provide the antecedent basis for the passage identified by the Examiner, and thus has overcome Examiner’s rejection. As with the prior amendments, only a cursory review of the technical change should be required.

The other Section 112 rejections by Examiner were due solely to dependency on the amended claims that were just discussed. Thus, their Section 112 rejections must be overcome by overcoming the rejections to the claims from which they depend.

As noted by the Examiner in the summary of the Interview, these amendments overcome the Section 112 rejections. The Applicant respectfully requests that all Section 112 rejections be withdrawn.

The Examiner states that the preamble of claims 1 and 21 correspond to the Applicant’s arguments traversing the rejections in the first office action of January 17, 2003, but also states that the body of the amended claims do not respond. This conclusion results from reading “identifiers content elements” as a distinct element. Claims 1 and 21 are herein amended so that the body of the claims clearly corresponds to the preamble, so that the prior arguments now apply to claims. Citing a new ground of rejection under Section 112, the Examiner states that the arguments are moot. Since the current amendments overcome the new Section 112 rejections, the Applicant incorporates and partially repeats below the prior arguments and respectfully requests that the Examiner consider the Applicant’s contention that they overcome the Section 103 rejection as well.

In paragraph 17 of the Examiner’s Response, the Examiner claims that although the Applicant argued that Barr does not deal with legal materials, the claims are not limited to legal

materials. Claim 3 is already so limited, since it requires “case citations.” None of the cited references focus on legal materials or their unique properties.

Claim 1 teaches the simultaneous display of a list of identifiers for at least two search results along with a content element of at least one of the results. There must be more than one identifier. The Examiner claims that when Barr is combined with Miike, the claimed invention is obtained. The Applicant respectfully asserts that this is not the case. The invention disclosed in Miike is a data retrieval system that focuses on “environmental data” such as whether there is a coffee stain on a document. Its emphasis is on how to search and display this kind of data, not on how to display search results from a text search. Although Miike discusses displaying “the document name and the content of the document identified by the document ID,” (col. 24, lines 20-21) a glance at Figs. 21 and 24 that are referenced to illustrate this paragraph, we see that something else is intended. In these figures, there are only names of documents and names of places and locations. There are no text documents or other content elements as envisioned by the present invention and there is no indication of showing both an identifier and part of any text. One skilled in the art would consider this patent to be unrelated to the present invention, and would not be led to think of a display of an identifier with a content element as intended in the present invention.

Indeed, Miike teaches away from the present invention. Miike does not teach a display of a content element with a list of identifiers, stating that content should be displayed when there is only one document in the retrieval result. Col. 24, lines 18-21. When a list is displayed, as in fig. 24, no content elements are to be displayed. Col. 24, lines 21-23. Thus, Applicant respectfully asserts that the Examiner is mistaken that Miike shows an “ability [to] simultaneously display a list of items and there [sic] content.” Miike figs. 21 and 24 and indeed

the figures in Barr are quite different from fig. 3 of the Application, showing one embodiment of the claimed invention, where there are two simultaneous display panels, one with a results list and the other with the content of a particular document from the results list.

Barr in contrast teaches a way to query a database and a display of search results including the simultaneous display of identifiers and secondary bibliographic information. However, it does not teach the display of any element of the actual work that is identified. The portions of the patent identified by the Examiner support this conclusion. Query server 116 in fig. 3 of Barr merely conducts queries. Element 206 of fig. 2 of Barr refers to choosing an item from a results list, but does not address the display of the results list. Fig. 4A of Barr shows a display that includes the simultaneous display of labels (i.e., the names of particular movies or documents), relevance scores, and bibliographic information, but nowhere shows the display of any portion of the content of any record. Similarly, Barr's fig. 5 shows a variety of information about a given document, but does not include any portion of the document itself. The portion of Barr cited by the Examiner in col. 12 refers to identifying documents and files relevant to a search query, but does not mention a display of content elements of those documents. The portion of Barr cited in col. 14 describes the display shown in Fig. 4A of Barr and discusses how the user may either select a document or perform a further search, but nowhere is there a mention of displaying any of the content of the documents or files.

If one were to combine Barr and Miike, one would likely add environmental information to the search results provided in Barr. It would be very unlikely to come up with displays like figs. 2 and 3 in the original Application since neither patent showed the combination of text and an identifier for even one record. Indeed, Miike teaches away from just such a conclusion. In the portion cited by the Examiner, Miike says content is displayed with an identifier when there

is only one search result, but when there are multiple search results, only the identifiers are provided. Col. 24, lines 18-23. In the latter case, if the user wants to see the full document, she must select the document name. Col. 24, lines 23-29. Miike is simply reinforcing the prior art notion that the results screen simply should contain names or other identifiers of results, but in the special case of there being only one result, other content can be shown. Combined with Barr, this would actually dissuade one from thinking of the claimed invention. The Examiner noted in the Interview that because of Miike's teaching away from the present invention, she expects to remove it as a reference.

It is also not likely that one skilled in the art would think to combine Miike and Barr, since they are not sufficiently similar and because of Miike's esoteric nature, length, and complexity. Miike teaches a data retrieval system that focuses on "environmental data" like coffee stains on a page or where the user was physically when doing the last set of edits. Col. 1, lines 46-58; col. 12, lines 4-13. Such systems are not in common use, and one skilled in the art of more standard retrieval systems, like the one assumed to be used in the present invention where the user does a simple text search to generate results, would not be aware of this kind of system.

The above arguments show that Barr and Miike should not be combined and if they are, one still does not obtain the claimed invention. Since claims 2—4, 6--20, 50, 52, 54, 58, 62, 63, and 66 depend from claim 1 and claims 21-24, 26-30, 34-49, 51, 53, 55, 59, 64, 65, 67 and 71 depend from claim 21, these claims cannot be obvious if claims 1 and 21 are not obvious. As a result, the above shows that none of claims 1-4, 6-24, 26-30, 34-55, 58-59, 62-67, and 71 should be rejected for obviousness under 35 U.S.C. § 103. Nonetheless, for completeness, the Applicant will herein respond to the specific citations that were provided by the Examiner to show the

obviousness of the dependent claims. The Applicant notes that Barr does not discuss displaying content elements, so that none of the references to Barr can make any claim obvious since all claims demand the display of at least one content element.

Regarding claim 2, the Examiner cites Barr fig. 4A and 5. In claim 2, the content element displayed is the entirety of the document. The portions of Barr cited by the examiner do not teach the display of any content element, as discussed above. Miike in the portion cited by the Examiner discusses displaying “the content” of the document, and does not discuss how much of the content is displayed. Claim 2 is therefore is not obvious in light of the references cited by the Examiner.

In claim 3, the identifiers are case citations that are used on legal materials. Barr does not deal with legal materials at all. Fig. 4A shows a display with the title of a text or multi-media document, but does not teach including the unique legal citation that would correspond to a judicial opinion. For example, the title of a case could simply be deemed to be “U.S. v. Smith,” whereas a proper citation could be 65 N.W.2d 395 (1987), for example. However, claim 3 teaches identifying the case not by its title, but by the uniform system of citation that is unique to legal materials and not discussed by either Barr or Miike. Claim 3 is therefore not obvious in light of the references cited by the Examiner.

Claim 4 was discussed at length during the Interview and the Examiner believes it is allowable. Element 206 of fig. 2 of Barr teaches choosing an item from a results list, but nowhere implies tracking which items had been responsive or chosen before and does not address how any items would be displayed. Fig. 4A shows a display of various items, but does

not teach identifying previously responsive or viewed items in any way. Claim 4 is therefore not obvious in light of the references cited by the Examiner.¹

Regarding claim 6, the portion of Barr cited by the Examiner does indeed discuss relevance sorting, but it does not address the display of identifiers and content. Claim 6 is therefore not obvious in light of the references cited by the Examiner.

Regarding claim 7 (possibly inadvertently identified by the Examiner as claim 8), element 400 of fig. 5 of Barr does show a variety of fields. It does not, however, address the display issues at the heart of the invention. Claim 7 therefore is not obvious in light of the references cited by the Examiner.

Regarding claim 15, the Examiner cites a discussion of relevance sorting in Barr (col. 13, lines 30-67). Claim 15 adds the limitation that there is an additional step of resolving ties from a preceding sort. Barr teaches a single relevance sort and does not make any mention of how to handle situations where two records have the same relevance. Claim 15 is therefore not obvious in light of the references cited by the Examiner.

Regarding Claim 8 (possibly inadvertently identified by the Examiner as claim 7), the examiner cites Barr Col. 13, lines 30-67. As discussed above, this passage teaches relevance sorting, but does not discuss displaying identifiers and content elements. Claim 8 therefore is not obvious in light of the references cited by the Examiner.

¹ Although the Interview only expressly addressed allowing claim 4, the Applicant believes that a number of other claims deal with variations of the same subject matter and should be likewise allowable. Applicant notes that claims 16-20 teach identifying records that were displayed in their entirety during a prior search, and the different ways of marking those records. Claim 24 is the apparatus analogous to the method of claim 4 and should therefore be allowable. Claims 40-49 provide minor variations or special cases of claim 24 and should now be allowable for the same reasons that claim 24 is allowable. Claims 66 and 67 are like claims 4 and 24, except that they address records that were previously printed. Finally, new claims 74 and 75 are variations of claims 4 and 24, identifying records responsive to a prior database query.

Regarding claims 9-14, the Examiner cites Barr fig. 5 and Miike fig. 8. Barr fig. 5 lists preferred data structures, an image table, and a publisher information table, but makes no mention of sorting search results, as is required by the claims at issue. Fig. 8 of Miike represents a data retrieval system with the addition of an environmental analysis target data memory unit. According to Miike, this permits environmental analysis target data to be reanalyzed and augmented. Col. 20, line 47 to col. 21, line 6. However, nothing is said about the different ways of sorting data for a display, as is taught by claims 9-14. Claims 9-14 therefore are not obvious in light of the references cited by the Examiner.

Regarding claims 16-20, the Examiner cites Barr figs. 4A and 5. Claim 16 requires the identification of records that were displayed in a previous database request. None of the cited art mentions identifying the records that have been previously displayed. Also, none of the cited art discusses the different ways that records can be identified, as is claimed by claims 17-20 of the present invention. Claims 17-20 therefore are not obvious in light of the references cited by the Examiner.

The Examiner states that the rejections of the apparatus claims 21-24, 26-49 follow from the rejections of claims 1-4 and 6-20. The Applicant respectfully asserts that the arguments traversing the rejections of claims 1-4 and 6-20 should be applied to claims 21-24 and 26-49. The Applicant also notes that claims 21-24 and 26-49 contain additional elements not contained in claims 1-4 and 6-20 that further support a conclusion of non-obviousness. (Claims 31-33 have been temporarily cancelled. They are not presently under examination, so they cannot be rejected and are not discussed further). For example, claims 27-30 and 39 claim displays involving novel and non-obvious algorithms for sorting documents that were not addressed in the

rejection. Claims 21-24 and 26-49 therefore are not obvious in light of the references cited by he Examiner.

The Examiner states that the limitations of claims 50-55, 58-59, 62-67 and 71 have previously been addressed in the response, except for “wherein said content elements include paragraphs and means for identifying a most relevant document and an algorithm.” For this element, the Examiner cites Barr fig. 5, 5A, 5B, col. 23, line 10 through col. 24, line 55. For clarity, the Applicant notes that claims 54 and 55 claim identifying and choosing a most relevant paragraph of a document, not finding a most relevant document. This misunderstanding may explain why the Examiner rejected the claims. Barr does indeed discuss how to conduct a natural language search and how to compute the relevance of a document as a whole in col. 23, line 10 through col. 24, line 55. The concept of determining the relevance of a document is no longer novel. However, determining a most relevant paragraph of a document, regardless of the document’s relevance, and using that paragraph in a display to help the user determine whether the document is interesting, as is claimed in claims 54 and 55, is quite novel and not anticipated by Barr. Similarly, figs. 5, 5A, and 5B show preferred data structures and data storage formats, but do not represent ways of determining and displaying the most relevant paragraph of a document. Col 7, lines 58-63. Claims 50-55, 58-59, 62-67 and 71 therefore are not obvious in light of the references cited by the Examiner.

There are a number of other novel elements in these claims that have not been addressed by the Examiner. For example, claims 52 and 53 claim the special case of displaying the first paragraph of a document. This is particularly useful, for example, with legal documents where the court generally summarizes the case in the first paragraph. Claims 50 and 51 involve replacing the displayed content element with a different content element. This permits the novel

situation where users can change the content element displayed to fit their needs. Claims 58 and 59 add the novel element of resorting search results. When coupled with the invention's numerous claimed methods of sorting, this feature gives users enormous power and flexibility. Claims 62 to 65 involve XML tagging and claims 66 and 67 involve the novel step of identifying documents in a search result that have already been printed. Claim 71 involves sorting search results based on the number of times the documents were selected by users who were searching for the same keywords. No art is cited for any of these novel features and thus claims 50-55, 58-59, 62-67 and 71 therefore are not obvious in light of the references cited by the Examiner.

For all of these reasons, the Examiner's rejection under 35 U.S.C. § 103 of Claims 1-4, 6-24, 26-30, 34-55, 58-67 and 71 as obvious over Barr in view of Miike is respectfully traversed. Applicants respectfully assert that all of these grounds of rejection should be withdrawn.

The Examiner states that claims 56 and 57 are obvious over Barr in view of Miike and Jones. Here the Applicant believes the same arguments apply against combining Miike, Barr, and Jones that were discussed above regarding combining Barr and Miike. Furthermore, as noted previously, Miike teaches away from displaying content elements when there is more than one responsive record, and claims 56 and 57 expressly require at least two such records. Jones contemplates the simultaneous display of a document with linked resources that are related to the displayed document. Multiple documents and unrelated documents are not displayed. The abstract of Jones discusses displaying the content of a single document along with document metadata that contain document resources. Fig. 6 and col. 8, lines 19-35 of Jones (which was cited by the Examiner and indeed explains fig. 6) do not address display at all. Instead, these portions of Jones teach capturing and linking context information about a document. Fig. 8 of Jones does show a display, but it shows a letter and resources related to that letter. I would not

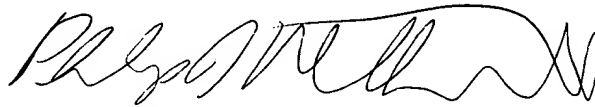
characterize it as a page image side-by-side with a story, as done by the Examiner. Importantly, there is no indication that a multi-panel display should be used to display multiple results from a search query, and the knowledge from Barr that records exist with content elements and the comment in Miike about displaying content when there is only one search result would not have been enough to disclose the present invention.

For all of these reasons, the Examiner's rejection under 35 U.S.C. § 103 of Claims 56 and 57 as obvious over Barr in view of Miike and Jones is respectfully traversed. Applicants respectfully assert that all of these grounds of rejection should be withdrawn.

Applicant notes that the Examiner responded to the Applicant's arguments in response to the First Office Action by saying that the preamble, but not the body, of the amended claims correspond to the argument. The amendments in this paper clarify that the preamble and body do correspond, so that those arguments should be considered. The Examiner also cites Miike; as discussed herein, Miike teaches away from the present invention and should be withdrawn.

Applicants respectfully submit that the arguments submitted herein, in conjunction with the claim amendments, overcome or obviate each of the Examiner's objections and rejections and place Claims 1-4, 6-24, 26-30, 34-67, 71, and 74-75 in condition for allowance.

Respectfully submitted,



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